

### REMARKS

Claims 1-27 are pending. Claims 23-27 stand rejected under 35 USC § 101, claims 1, 12, and 23 stand rejected under 35 USC § 102, and claims 2-7, 13-18, 24-25, and 27 stand rejected under 35 USC § 103. Applicant respectfully traverses the rejections in light of the amendments and the following remarks.

#### Applicant requests interview

Applicant respectfully requests an interview if it would expedite disposition of the application. The undersigned attorney would welcome and encourage a telephone conference with Examiner at (512) 391-4913.

#### Objections to the specification

Applicant requests entry of amendments above to the first paragraph of the specification. These amendments address the objections to the specification in the Office action.

#### Claim rejections under 35 USC § 101

Claims 23-27 stand rejected under 35 USC § 101 as being non-statutory subject matter. Applicant respectfully suggests that the amendments to claims 23-27 to cover a computer program product clearly describe statutory subject matter. Applicant traverses the rejections and requests the rejections be withdrawn.

#### Claim rejections under 35 USC § 102

Claims 1, 12, and 23 stand rejected under 35 USC § 102 as being anticipated by Ober et al., U.S. Patent No. 6,708,273 (hereinafter referred to as "Ober"). Applicant respectfully suggests that the rejections are traversed with the following remarks.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single reference.<sup>1</sup> Furthermore, the identical invention must be shown in as complete detail as is contained in the claim.<sup>2</sup>

With regards to claim 1, the Office action fails to establish a prima facie case of anticipation for independent claim 1 because Ober prov fails to describe, either expressly or inherently, "each and every element as set forth in the claim". In particular, Ober fails to describe a plurality of processors in a cascaded arrangement, each processor having an input coupled to the input interface and an output coupled to respective inputs of each of the other processors downstream in the arrangement, the processors each configured to perform respective cryptographic operations on the data.

Ober describes an encrypt block and a hash block having inputs and outputs connected to a PCMIA bus 76 and an EMI bus 70. Ober does not describe, explicitly or inherently, "a cascaded arrangement, each processor having an input coupled to the input interface and an output coupled to respective inputs of each of the other processors downstream in the arrangement," which is a limitation of claim 1. As a result, Ober does not describe claim 1 in complete detail and does not anticipate claim 1. Applicant respectfully traverses that the rejection, requests that the rejection be withdrawn, and requests that claim 1 be allowed.

Claims dependent upon claim 1 incorporate the limitations of claim 1 and thus Applicant traverses rejections of claims 1-11 and requests that claims 1-11 be allowed.

With regards to claim 12, the Office action fails to establish a prima facie case of anticipation for independent claim 12 because Ober prov fails to describe, either expressly or inherently, "each and every element as set forth in the claim". In particular, Ober fails to describe directing the received data through a cascaded arrangement of processors according to a predetermined algorithm, each processor having an input coupled to the received data and an output coupled to respective inputs of each of the other processors downstream in the arrangement.

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<sup>1</sup> *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987).

<sup>2</sup> *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Ober describes an encrypt block and a hash block having inputs and outputs connected to a PCMIA bus 76 and an EMI bus 70. Ober does not describe, explicitly or inherently, "directing the received data through a cascaded arrangement of processors according to a predetermined algorithm, **each processor having an input coupled to the received data and an output coupled to respective inputs of each of the other processors downstream in the arrangement,**" which is a limitation of claim 12. As a result, Ober does not describe claim 12 in complete detail and does not anticipate claim 12. Applicant respectfully traverses that the rejection, requests that the rejection be withdrawn, and requests that claim 12 be allowed.

Claims dependent upon claim 12 incorporate the limitations of claim 12 and thus Applicant traverses rejections of claims 13-22 and requests that claims 13-22 be allowed.

With regards to claim 23, the Office action fails to establish a prima facie case of anticipation for independent claim 23 because Ober fails to describe, either expressly or inherently, "each and every element as set forth in the claim". In particular, Ober fails to describe directing the received data through a cascaded arrangement of processors according to a predetermined algorithm, each processor having an input coupled to the received data and an output coupled to respective inputs of each of the other processors downstream in the arrangement.

Ober describes an encrypt block and a hash block having inputs and outputs connected to a PCMIA bus 76 and an EMI bus 70. Ober does not describe, explicitly or inherently, "directing the received data through a cascaded arrangement of processors according to a predetermined algorithm, **each processor having an input coupled to the received data and an output coupled to respective inputs of each of the other processors downstream in the arrangement,**" which is a limitation of claim 23. As a result, Ober does not describe claim 23 in complete detail and does not anticipate claim 23. Applicant respectfully traverses that the rejection, requests that the rejection be withdrawn, and requests that claim 23 be allowed.

Claims dependent upon claim 23 incorporate the limitations of claim 23 and thus Applicant traverses rejections of claims 23-27 and requests that claims 23-27 be allowed.

Claim rejections under 35 USC § 103(a)

The Office action rejected claims 2-7, 13-18, 24-25, and 27 under 35 USC § 103(a) as being unpatentable over Ober, U.S. Patent Application No. 6,708,273 (hereinafter referred to as "Ober") in view of Friedman et al., U.S. Patent Application No. 6,240,513 (hereinafter referred to as "Friedman"). The Office action rejected claims 8-9, 19-20, and 26 under 35 USC § 103(a) as being unpatentable over Ober in view of Howard et al., U.S. Patent Application No. 6,901,516 (hereinafter referred to as "Howard") and claims 10 and 21 under 35 USC § 103(a) as being unpatentable over Ober in view of Howard and Friedman.

To establish a prima facie case of obviousness, the modification or combination must teach or suggest all of Applicants' claim limitations.<sup>3</sup>

The combination of Ober, Friedman, and Howard fails to establish a prima facie case of obviousness for independent claims 1, 12, and 23 because the combination fails to teach or suggest all of Applicants' claim limitations. In particular, the combination fails to teach or suggest a cascaded arrangement, **"each processor having an input coupled to the received data and an output coupled to respective inputs of each of the other processors downstream in the arrangement."**

Applicant respectfully traverses these rejections of claims dependent upon claims 1, 12, and 23, requests the rejections be withdrawn and requests that all claims be allowed.

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<sup>3</sup> *In re. Royka*, 490 F.2d 981, 985, 180 USPQ 580, 583 (CCPA 1974).

CONCLUSION

Applicant respectfully traverses the cited references with regards to the claim rejections under 35 USC §§ 102 and 103. Accordingly, Applicant believes that this response constitutes a complete response to each of the issues raised in the Office action. In light of the accompanying remarks, Applicant believes that the pending claims are in condition for allowance. Thus, Applicant requests that the rejections be withdrawn, pending claims be allowed, and application advance toward issuance.

A petition and fee for an extension of time accompany this action. No other fee is believed due with this paper. However, if any fee is determined to be required, the Office is authorized to charge Deposit Account 50-0563 for any such required fee.

Respectfully Submitted,

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/Jeffrey S. Schubert/

Date

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